

**EXHIBIT 76**  
**FILED UNDER SEAL**

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - -  
JANE DOE 1, individually and on  
behalf of all others similarly  
situated,

Plaintiff,

Civil Action No.

-against-  
JP MORGAN CHASE BANK, N.A.

Defendants.

- - - - -  
Highly Confidential-Attorneys Eyes Only

Videotaped oral deposition of  
JUSTIN NELSON, taken pursuant to  
subpoena, was held BOIES SCHILLER  
FLEXNER, 55 Hudson Yards, New York, New  
York commencing April 21, 2023, 9:42  
a.m., on the above date, before Leslie  
Fagin, a Court Reporter and Notary  
Public in the State of New York.

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2	discussion within that meeting that led to	09:45:54
3	the conclusion that Jeffrey Epstein was going	09:45:56
4	to be terminated as a client?	09:45:57
5	A. I don't remember specifics.	09:45:59
6	Q. What was your understanding as to	09:46:00
7	the reason or reasons that Jeffrey Epstein	09:46:02
8	was going to be terminated?	09:46:04
9	A. Reputational risk.	09:46:06
10	Q. By reputational risk, what did that	09:46:08
11	mean in this particular context, that being	09:46:14
12	related to Jeffrey Epstein?	09:46:16
13	MR. BUTTS: Objection to form.	09:46:18
14	You can answer.	09:46:20
15	A. I think we are aware of the history	09:46:21
16	of Jeffrey, Mr. Epstein, I think that's what	09:46:26
17	went into that decision.	09:46:31
18	Q. Do you remember there being a	09:46:32
19	discussion about any specific banking	09:46:36
20	activity in which he was engaged at the time,	09:46:39
21	that being 2013 time period, that also	09:46:42
22	contributed to that decision?	09:46:46
23	MR. BUTTS: Objection to form.	09:46:47
24	You may answer.	09:46:50
25	A. I don't remember.	09:46:50

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2 Q. After Jeffrey Epstein has been 13:30:03  
3 terminated, you get the permission of John 13:30:04  
4 Duffy to continue a relationship with Jeffrey 13:30:10  
5 Epstein where he will be a potential source 13:30:13  
6 of future referrals? 13:30:15

7 MR. BUTTS: Objection to form. 13:30:17

8 You may answer. 13:30:19

10 Q. Do you remember where you were when 13:30:19  
11 you had these discussions with Mr. Duffy? 13:30:21

12 A. I do not. 13:30:23

13 Q. Were you given any parameters of 13:30:24  
14 what is okay to do and what is not okay to do 13:30:27  
15 with respect to the relationship with Jeffrey 13:30:30  
16 Epstein? 13:30:33

17 A. Yes. 13:30:33

18 Q. What were they? 13:30:33

19 A. We would not engage in any type of 13:30:35  
20 relationship where Mr. Epstein had control of 13:30:40  
21 a relationship, where we had to interface 13:30:43  
22 with him directly as a decisionmaker of any 13:30:46  
23 kind. 13:30:50

24 Q. At some point in time, even if that 13:30:50  
25 was the objective from the beginning to make 13:30:54

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1	J. Nelson - Confidential	
2	sure you didn't have to interface with him to	13:30:57
3	get to a client, isn't that what happened	13:31:00
4	with respect to Leon Black?	13:31:03
5	MR. BUTTS: Objection,	13:31:05
6	mischaracterizes testimony.	13:31:07
7	Q. You can answer.	13:31:09
8	A. No because I never interfaced. We	13:31:12
9	spoke to Mr. Epstein, but he was never a	13:31:17
10	signer on an account for anyone else that we	13:31:22
11	interacted with, he was not a decisionmaker.	13:31:25
12	Q. Was there ever a point in time	13:31:30
13	where Leon Black was the client, but you and	13:31:33
14	your team could only speak with Mr. Epstein	13:31:37
15	as opposed to Mr. Black about the client	13:31:41
16	relationship?	13:31:45
17	MR. BUTTS: Objection.	13:31:46
18	You may answer.	13:31:48
19	A. We spoke to Mr. Epstein about	13:31:48
20	things related to Leon Black, but anything	13:31:51
21	that -- to actually do anything with Leon	13:31:56
22	Black had to go through Leon Black or his	13:32:00
23	family office.	13:32:02
24	Q. And Mr. Epstein was not able to be	13:32:03
25	a signatory on Mr. Black's accounts, right?	13:32:10

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1	J. Nelson - Confidential	
2	A. Correct.	13:32:13
3	Q. Did there come a point in time	13:32:13
4	where there was a signatory, but Jeffrey	13:32:16
5	Epstein was the person that was making the	13:32:20
6	calls for Mr. Black?	13:32:22
7	MR. BUTTS: Objection to form.	13:32:25
8	You may answer if you are able.	13:32:26
9	A. There were times where Mr. Epstein	13:32:27
10	had a recommendation, but I can't remember	13:32:32
11	any of those things getting done, so, no.	13:32:38
12	Q. How many times do you think you	13:32:43
13	visited Mr. Epstein after he was terminated	13:32:48
14	from JPMorgan?	13:32:52
15	A. Several times.	13:32:54
16	Q. By several, ballpark what do you	13:32:55
17	think we are talking about?	13:33:01
18	A. Eight to 10, in that range.	13:33:02
19	Q. When is the last time that you	13:33:04
20	remember visiting Jeffrey Epstein, what year?	13:33:05
21	A. I don't remember.	13:33:08
22	Q. Did you visit Jeffrey Epstein as	13:33:09
23	late as 2017?	13:33:12
24	A. It is possible.	13:33:14
25	Q. Did you ever spend the night at any	13:33:16